STATE OF NEW MEXICO NEW MEXICO WATER QUALITY CONTROL COMMISSION

IN THE MATTER OF: PROPOSED)	
AMENDMENTS TO STANDARDS FOR)	
INTERSTATE AND INTRASTATE)	Docket No. WQCC 20-51 (R)
WATERS, SECTION 20.6.4 NMAC.	

COMMUNITIES FOR CLEAN WATER AND THE GILA RESOURCES INFORMATION PROJECT CONCURRENCE IN AMIGOS BRAVOS' MOTION TO STRIKE PROPOSED AMENDMENTS TO DEFINITION OF "TOXIC POLLUTANT"

On December 16, 2021, Amigos Bravos filed a Motion to Strike LANL's Proposed Amendment to Definition of "Toxic Pollutant" at 20.6.4.7.T(2) NMAC, together with a Memorandum in Support thereof. Communities for Clean Water and Gila Resources Information Project concur in and support the motion, generally for the reasons stated in the Memorandum in Support.

Respectfully submitted,

December 21, 2021

CHARLES de SAILLAN

Attorneys

New Mexico Environmental Law Center

1405 Luisa Street

Suite 5

Santa Fe, New Mexico 87505-4074

(505) 989-9022

cdesaillan@nmelc.org

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of December 2021, a copy of the foregoing Communities for Clean Water and the Gila Resources Information Project Concurrence in Amigos Bravos' Motion to Strike Proposed Amendments to Definition of "Toxic Substances" was sent by electronic mail to:

Annie Maxfield
John Verheul
Assistant General Counsel
Office of General Counsel
New Mexico Environment Department
121 Tijeras, NE, Suite 1000
Albuquerque, New Mexico 87102
505-222-9592
annie.maxfield@state.nm.us John.verheul@state.nm.us
Attorneys for the New Mexico Environment Department

Louis W. Rose
Kari Olson
Montgomery & Andrews, P.A.
Post Office Box 2307
Santa Fe, New Mexico 87504-2307
505-982-3873
lrose@montand.com
kolson@montand.com
Attorneys for Triad National Security, LLC

Robert F. Sanchez
Assistant Attorney General
Office of the Attorney General
Post Office Box 1508
Santa Fe, New Mexico 87504-1508
rfsanchez@nmag.gov
Attorney for the Water Quality Control Commission

Maxine Reynolds
Office of Laboratory Counsel
Los Alamos National Laboratory
Post Office Box 1663, MS A187
Los Alamos, New Mexico 87545
505-667-7512
mcreynolds@lanl.gov
Attorney for Triad National Security, LLC

Silas R. DeRoma
Stephen Jochem
United States Department of Energy
National Nuclear Security Administration
Los Alamos Site Office
3747 West Jemez Road
Lost Alamos, New Mexico 87544
505-667-4668
silas.deroma@nnsa.doe.gov
stephen.jochem@nnsa.doe.gov
Attorneys for the United States Department of Energy

Tannis Fox Western Environmental Law Center 208 Paseo del Pueblo Sur, #602 Taos, New Mexico 87571 505-629-0732 fox@westernlaw.org Attorney for Amigos Bravos

Jolene L. McCaleb Elizabeth Newlin Taylor Taylor & McCaleb, P.A. P.O. Box 2540 Corrales, New Mexico 87048-2540 505-888-6600 jmccaleb@taylormccaleb.com etaylor@taylormccaleb.com Attorneys for San Juan Water Commission Stuart R. Butzier
Modrall Sperling Roehl Harris & Sisk, P.A.
Post Office Box 2168
Santa Fe, New Mexico 87504-9318
505-848-1899
srb@modrall.com
ccs@modrall.com
Attorneys for New Mexico Mining Association

Dalva Moellenberg
Gallagher & Kennedy
1239 Paseo de Peralta
Santa Fe, New Mexico 87501-2758
505-982-9523
dlm@gknet.com
Attorney for New Mexico Mining Association

Kyle Harwood
Luke Pierpont
Egolf + Ferlic + Martinez + Harwood, LLC
123 West San Francisco Street, Floor 2
Santa Fe, New Mexico 87501
505-596-9938
kyle@egolflaw.com
Attorneys for the Buckman Direct Diversion Board

Alexander Arensberg
Carolyne L. McIntosh
Squire Patton Boggs LLP
1801 California Street 4900
Denver, Colorado 80202
alexander.arensberg@squirepb.com
carolyne.mcintosh@squirepb.com

Charles de Saillan